CHRIS T. RASMUSSEN, ESQ. 1 Nevada Bar No. 007149 RASMUSSEN LAW P.C. 520 South 4th Street Las Vegas, Nevada 89101 3 (702) 384-5563 ctr@rasmussenlaw.com 4 Attorney for Defendant 5 UNITED STATES DISTRICT COURT 6 DISTRICT OF NEVADA 7 8 UNITED STATES OF AMERICA, Case No.: 2:19-cr-00300-JCM-EJY 9 Plaintiff. 10 STIPULATION TO CONTINUE SENTENCING VS. 11 FERNANDO RAMIREZ, JR., 12 Defendant. 13 14 15 IT IS HEREBY STIPULATED AND AGREED by and between defendant, 16 FERNANDO RAMIREZ JR., by and through his counsel, Chris T. Rasmussen, Esq., and the 17 United States America, by its counsel, Simon F. Kung, Assistant United States Attorney, that the 18 above-captioned matter currently scheduled for sentencing on May 5, 2021 at 10:00 a.m. be 19 vacated and continued for 90 days or for a time suitable to the court. 20 This Stipulation is entered into for the following reasons: 21 1. The parties agree to a continuance; 22 2. Counsel for Defendant needs additional time to adequately prepare for sentencing; 23 3. Defendant is not in custody. Counsel for the Defendant has spoken to the Defendant 24 and the Defendant has no objection to this continuance; 25 4. Denial of this request could result in a miscarriage of justice; 26 5. For all the above- stated reasons, the ends of justice would best be served by a 27 continuance of the sentencing date by 90 days. 28 1

	Case 2:19-cr-00300-JCM-EJY Document 225 Filed 04/28/21 Page 2 of 4
1 2 3	6. This is the sixth request for continuance. DATED this 28 th day of April, 2021.
5	/s/ Chris T. Rasmussen /s/ Simon F. Kung
6 7	CHRIS T. RASMUSSEN, ESQ. Attorney for Defendant SIMON F. KUNG Assistant United States Attorney
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6	UNITED STATES DISTRICT COURT
7	DISTRICT OF NEVADA
8	UNITED STATES OF AMERICA,)
9) Case No.: 2:19-cr-00300-JCM-EJY Plaintiff,
10 11	vs. FINDINGS OF FACT AND CONCLUSIONS OF LAW
12	FERNANDO RAMIREZ, JR.,
13	Defendant.)
14	FINDINGS OF FACT
15	Based on the stipulation of counsel, and good cause appearing, the Court finds that:
16	1. The parties agree to a continuance;
17	2. Counsel for Defendant needs additional time to adequately prepare for sentencing;
18	3. Defendant is not in custody. Counsel for the Defendant has spoken to the Defendant
19	and the Defendant has no objection to this continuance.
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21	CONCLUSIONS OF LAW
22	Denial of this request would result in a miscarriage of justice;
23	2. For all the above-stated reason, the ends of justice would best be served by a
24	continuance of the sentencing date for 90 days.
25	continuance of the sentenening date for 70 days.
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UNITED STATES DISTRICT COURT DISTRICT OF NEVADA

2	DISTRICT OF NEVADA
3	
4	UNITED STATES OF AMERICA,) Case No.: 2:19-cr-00300-JCM-EJY
5	Plaintiff,
6	vs. ORDER
7	FERNANDO RAMIREZ, JR.,
8	Defendant.
9)
10	Accordingly, IT IS SO ORDERED that the sentencing currently scheduled for May 5,
11	2021, at the hour of 10:00 a.m., be vacated and continued to August 11, 2021, at the
12	hour of <u>10:00 a.m</u> .
13	DATED April 30, 2021.
14	Xellus C. Mahan
15	UNITED STATES DISTRICT JUDGE
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